

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

IN RE:

**FEYSAL AYATI-GHAFFARI
DEBTOR(S)**

§
§
§
§

**CASE NO. 18-41997
CHAPTER 13**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now JPMorgan Chase Bank, National Association (hereinafter "Chase"), a secured creditor in the above-entitled and numbered case, filing this its Objection to Confirmation of Chapter 13 Plan, and in support hereof represents:

1. The above-styled Debtor(s) filed a voluntary petition under Chapter 13 of Title 11, United States Bankruptcy Code, on September 4, 2018.
2. Debtor(s) is indebted to Chase pursuant to a promissory note secured by a recorded instrument granting a security interest in the real property with the address of 4508 Lone Grove Lane, Plano, Texas 75093 (the "Property").
3. The Property is the Debtor(s)' principal residence.
4. The total debt due and owing to Chase as of the date of filing was \$247,359.68, with pre-petition arrearage in the amount of \$110,003.82 (the "Claim").
5. Debtor(s) Chapter 13 Plan (the "Plan") as proposed does not provide for the pre-petition arrearage portion of the Claim.
6. Chase objects to confirmation of the Plan because:
 - a. it does not comply with Section 1322(b)(2) and is not feasible because it fails to provide for the pre-petition arrearage portion of the Claim.

WHEREFORE, PREMISES CONSIDERED, Chase prays that this Court deny confirmation of the Plan, and grant it such other and further relief at law and in equity as is just.

Respectfully submitted,
Bonial & Associates, P.C.

/s/ Chandra D. Pryor

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been served upon the following parties in interest either via pre-paid regular U.S. Mail or via electronic notification on or before the 19th day of November 2018:

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18-41997

/s/ Chandra D. Pryor
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